

**Federal Defenders
OF NEW YORK, INC.**

David E. Patton
*Executive Director
and Attorney-in-Chief*

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

Document 45
Southern District of New York FILED
by Jennifer L. Brown
Attorney-in-Charge
DATE FILED: 9-12-22

September 9, 2022

VIA ECF & EMAIL

The Honorable Vincent Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

Re: *United States v. Dimas Ramirez, 22-cr-386 (VB)*

Dear Honorable Judge Briccetti:

I write to respectfully request that the Court modify Mr. Ramirez's bail conditions to permit certain travel within the Southern District during September and October 2022 as specified below.

Mr. Ramirez requests permission to go apple picking with his family for his son's birthday on Saturday, September 17, 2022, from 10:00 a.m. to 3:00 p.m. (including travel time). The family plans on going to Orchards of Conklin in Pomona, New York. In addition, he is requesting to attend his daughter's home field hockey games at her school on September 16th from 4 p.m. to 7 p.m.; September 24th from 1 p.m. to 4 p.m.; September 30th from 4 p.m. to 7 p.m.; October 8th from 10:30 a.m. to 2 p.m.; and October 14th from 4:30 p.m. to 8:30 pm. He plans on attending these games with his wife, Cindy Ramirez, and/or other adult family members.

Mr. Ramirez's Pre-trial Officer, Leo Barrios, has no objection to this request so long as Mr. Ramirez is accompanied by his wife or another adult. I have contacted the Government, through Assistant United States Attorney Marcia Cohen, who also has no objection to this request. Thank you for your time and consideration of this matter.

Respectfully submitted,

Elizabeth K. Quinn

Elizabeth K. Quinn
Assistant Federal Defender

cc: Marcia Cohen, AUSA
Leo Barrios, PTO